

MEMORANDUM

To: File

From: John Fieldsend
Special Counsel
Office of Rulemaking
Division of Corporation Finance
U.S. Securities and Exchange Commission

Date: November 4, 2011

Re: Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act Regarding Congolese Conflict Minerals

On November 4, 2011, Paula Dubberly, Felicia Kung, and John Fieldsend of the Division of Corporation Finance participated in the telephone call with Melanie Dolan and Amanda Nelson of KPMG LLP, Chris Holmes and Dan Murrin of Ernst & Young LLP, and Annette Schumacher of the Center for Audit Quality. The participants discussed the Commission's required rulemaking in Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act, which relates to reporting requirements regarding conflict minerals originating in the Democratic Republic of the Congo and adjoining countries.